

THE MACDONALD LAW FIRM

Angelo G. MacDonald, Esq.
Attorney & Counselor at law

**200 West 60th Street, Suite 3A
New York, New York 10023
(917) 385-1001
Fax: 914-725-1700
gothamlaw@yahoo.com
www.agmacdonaldlaw.com**

- Admitted in New York and New Jersey -

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By ECF

The Honorable LaShann DeArcy Hall
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

**RE: United States of America v. Jin Hua Zhang et al.
Criminal Docket No. 1:22-cr-00458-LDH:
Defendant: JIAHUI MIAO
MOTION/REQUEST FOR MODIFICATION
OF BAIL/BOND CONDITIONS**

Dear Judge DeArcy Hall:

Please accept this Motion/Request, in letterform, for a modification of Mr. Miao's current bail/bond conditions.

First, Mr. Miao is respectfully requesting special permission to work outside of his residence¹.

¹ Mr. Miao, with counsel, appeared before the Eastern District of New York Court on August 30, 2023, at 11:00 a.m. to address his bail/bond conditions because the Government sought to have the original bail/bond conditions modified. One modification the Government sought was that the defendant be incarcerated (remanded) for violating certain terms and conditions of the original bail/bond conditions and for allegations of new crimes committed by the defendant. The court, at that time and after a hearing, did not incarcerate the defendant but increased the bail/bond amount and imposed a number

Upon information and belief, Mr. Miao's primary occupation involves purchasing real estate investments, which often requires him to conduct on-site inspections of properties, as well as face-to-face meetings with lawyers, loan banks, real estate agents, property appraisers and property inspectors.

Due to the Court's modified 'home confinement' mandate, he has been unable to carry out these essential business activities. This modified 'home confinement' mandate severely hinders his work progress and also places significant financial strain on him. It is preventing him from earning a livelihood.

As a direct result of this modified 'home confinement' mandate he is currently facing overdue payments on multiple loans.

Second, Mr. Miao is respectfully seeking a bail/bond modification and special permission to exercise outside of his home.

The modified 'home confinement' mandate has had a severe negative impact on his physical health. When this criminal matter commenced Mr. Miao was a fit and healthy young man. Since the modification of his bail/bond conditions he has gained approximately 55 lbs. (25kg). This high percentage of total mass weight gain poses a serious threat to his overall health. Mr. Miao has visited and consulted with his doctor (Pei Gao M.D.), who expressed concern regarding this weight gain development and recommends that he engage in physical exercise outdoors at least 3-5 times a week. Included with the Motion/Request is a notarized letter from his physician, Dr. Gao.

Given the aforementioned circumstances, Mr. Miao hopes that this Court can understand these predicaments and grant him special permission to work and exercise outdoors.

Mr. Miao wishes to inform the Court that he can assure you that he will adhere to all relevant laws and health guidelines during his outings to ensure the safety of both himself and others.

In light of the above, Mr. Miao asks that these modifications be granted.

Respectfully submitted,

By: /s/ Angelo G. MacDonald
Angelo MacDonald, Esq.
Attorney for the Defendant
Jiahui Miao

of additional conditions for the defendant to abide by. One of those additional conditions was a more restrictive home confinement condition.